

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

DAEDALUS BLUE, LLC,

Plaintiff,

v.

MICROSTRATEGY INCORPORATED,

Defendant.

Civil Action No. 2:20-cv-00551-RCY-RJK

**JOINT MOTION TO MODIFY SCHEDULING ORDER AND EXPERT DISCOVERY  
SCHEDULE AND MEMORANDUM IN SUPPORT**

Plaintiff Daedalus Blue, LLC (“Plaintiff” or “Daedalus”) and Defendant MicroStrategy Incorporated (“Defendant” or “MicroStrategy”) (collectively, the “Parties”), by and through their undersigned counsel, respectfully jointly move to modify the Court’s scheduling order and schedule for expert discovery, as follows:

1. On June 1, 2022, the last day of fact discovery (ECF No. 89), Plaintiff served supplemental responses to Defendant’s Interrogatory No. 1 which included updated infringement contentions.
2. To avoid unfairness, Defendant seeks an opportunity to respond to Plaintiff’s updated infringement theories and thus the Parties have agreed to a deadline of June 27, 2022 for Defendant to serve supplemental responses to Plaintiff’s Interrogatory No. 1 regarding non-infringement contentions.

3. In light of the foregoing, the Parties respectfully and additionally request that the Court modify the schedule for expert discovery by two-days as follows:

Event	Current Deadline	Proposed Deadline
Initial Expert Reports	June 29, 2022	July 1, 2022
Responsive Expert Reports	July 27, 2022	July 29, 2022
Rebuttal Expert Reports	August 10, 2022	August 12, 2022
Close of Expert Discovery	August 24, 2022	August 26, 2022

4. The requested changes in the schedule will not cause undue delay or prejudice. The Parties include a [Proposed] Agreed Order attached as **Exhibit 1** setting forth the relief sought, and respectfully request that this Court enter the [Proposed] Agreed Order.

Dated: June 14, 2022

Respectfully Submitted,

/s/ Walter D. Kelley, Jr.

/s/ Stephen E. Noona

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically with the Clerk of the Court using the ECF system. Therefore, this document was served on all counsel who are ECF participants who are deemed to have consented to electronic service.

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